

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

LAURA ABRAMS on behalf of herself  
and all others similarly situated,

Plaintiff,

v.

THE SAVANNAH COLLEGE OF ART  
AND DESIGN, INC.,

Defendant.

CIVIL ACTION NO.  
1:22-CV-04297-LMM

**PLAINTIFF’S UNOPPOSED MOTION FOR PRELIMINARY APPROVAL  
OF CLASS ACTION SETTLEMENT AND PRELIMINARY  
CERTIFICATION OF SETTLEMENT CLASS**

Under Federal Rule of Civil Procedure Rule 23(e), and subject to Court approval, Plaintiff Laura Abrams (“Plaintiff”), on behalf of herself and all others similarly situated, respectfully moves the Court for preliminary approval of the proposed settlement of this class action under Rule 23 of the Federal Rules of Civil Procedure.

Plaintiff requests that the Court grant the Motion and enter a Preliminary Approval Order (a) preliminarily certifying the Settlement Class, appointing Class Representatives for the Settlement Class, and appointing Class Counsel as counsel for the Settlement Class; (b) preliminarily approving the proposed settlement as appearing sufficiently fair, adequate, and reasonable to warrant the dissemination of the Class Notice; and, (c) granting any related relief as described in the attached

memorandum in support. Defendant, The Savannah College of Art and Design, Inc., does not oppose this motion.

Plaintiff's efforts have resulted in a proposed \$375,000 non-reversionary common fund settlement on behalf of herself and the Class that was negotiated at arm's-length. As explained in the supporting Memorandum, this proposed settlement is fair, reasonable, adequate, and in the Class's best interest. A proposed order granting this unopposed Motion is attached as **Exhibit 1**. The Settlement Agreement and Release Agreement ("Settlement Agreement") is attached as **Exhibit 2**, which includes reference to the Notice that will be distributed to potential Class Members via regular U.S. mail (Exhibit D to the Settlement Agreement). Also attached to the Settlement Agreement are the proposed Claim Form (Exhibit A to the Settlement Agreement) and Long Form Notice (Exhibit B to the Settlement Agreement), which will be posted on the Settlement Website, [www.savannahcollegedatasettlement.com.com](http://www.savannahcollegedatasettlement.com.com). The Declaration of Terence R. Coates in Support of Preliminary Approval is attached as **Exhibit 3** ("Coates Decl.") and the Declaration of Christopher Longley from Atticus Administration, LLC is attached as **Exhibit 4** ("Atticus Decl.").

For the reasons described in the supporting Memorandum, Class Settlement Counsel respectfully ask the Court to enter an Order: (1) certifying the Class for purposes of settlement; (2) appointing Abrams as representative of the Class; (3)

appointing the undersigned counsel as Class Counsel; (4) granting preliminary approval of the proposed Settlement; (5) approving the proposed form and manner of notice to the Class; (6) directing that the notice to the Class be disseminated by the Settlement Administrator, in the manner described in the Settlement; (7) establishing a deadline for Class members to request exclusion from the Settlement Class or file objections to the Settlement; and (8) setting the proposed schedule for completion of further settlement proceedings, including scheduling the Final Approval Hearing. A proposed Order Granting Preliminary Approval of Class Action Settlement is attached as **Exhibit 1**.

Respectfully submitted this 15th day of March, 2023.

/s/ N. Nickolas Jackson

N. Nickolas Jackson

**THE FINLEY FIRM, P.C.**

3535 Piedmont Road

Building 14, Suite 230

Atlanta, GA 30305

(t) (404) 320-9979

(f) (404) 320-9978

njackson@thefinleyfirm.com

Terence R. Coates (*appearing PHV*)

Justin C. Walker (*appearing PHV*)

Dylan J. Gould (*appearing PHV*)

**MARKOVITS, STOCK & DEMARCO,  
LLC**

119 E. Court Street, Suite 530

Cincinnati, OH 45202

(t) (513) 651-3700

(f) (513) 665-0219

tcoates@msdlegal.com

jwalker@msdlegal.com  
dgould@msdlegal.com

*Counsel for Plaintiff and the Class*

**CERTIFICATE OF SERVICE AND**  
**LOCAL RULE 7.1(D) CERTIFICATION**

I hereby certify that on March 15, 2023, I electronically filed the foregoing with the Clerk of Court using the ECF system, which will send notification of such filing and effectuate service to all counsel of record in this matter, pursuant to Local Rule 5.1.

I further certify that this motion has been prepared with one of the fonts and point selections approved by the Court in Local Rule 5.1(C).

/s/ N. Nickolas Jackson  
N. Nickolas Jackson

*Counsel for Plaintiff and the Class*